

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>DEBORAH ANTLITZ,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 17-cv-8135</b>
<b>v.</b>	)	
	)	
<b>FOREST PRESERVE DISTRICT</b>	)	
<b>OF COOK COUNTY,</b>	)	
<b>Defendant.</b>	)	

**PLAINTIFF’S COMPLAINT**

NOW COMES, Plaintiff, Deborah Antlitz, by and through her attorneys, DELANEY LAW, PC, and in complaint of Defendant, the Forest Preserve District of Cook County, and states as follows:

**INTRODUCTION**

1. Plaintiff, Deborah Antlitz, an employee of Defendant, of the Forest Preserve District of Cook County brings ther case pursuant to the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, as amended by the Civil Rights Act of 1991.

**JURISDICTION AND VENUE**

2. Plaintiff’s claims arise under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, as amended by the Civil Rights Act of 1991. Therefore, this Honorable Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(a)(4) and 42 U.S.C. § 2000e-5(f)(3).

3. Venue in the district is proper under 28 U.S.C. § 1391(b). The Defendant resides in the Northern District, Eastern Division, and the events giving rise to Plaintiff's claim occurred here.
4. All conditions precedent to jurisdiction have occurred or been complied with:
  - a. Plaintiff, Deborah Antlitz (hereinafter "ANTLITZ") filed a charge No. 21B201601728 against Defendant, Forest Preserve District of Cook County (hereinafter "COOK COUNTY") on July 7, 2016, with the Illinois Department of Human Rights, which was cross-filed with the Equal Employment Opportunity Commission, (hereinafter "EEOC"), a copy of which is attached hereto as **Exhibit 1**.
  - b. The EEOC issued ANTLITZ a notice of right to sue charge No. 21B201601728 a copy of which is attached hereto as **Exhibit 2**.

### **PARTIES**

5. Plaintiff, ANTLITZ, as a citizen of the United States and the State of Illinois and resides in Cook County, Illinois. At all times material to the Complaint ANTLITZ was employed by Defendant, COOK COUNTY, Illinois, in the County of Cook.
6. Defendant, COOK COUNTY, at all times relevant to the Complaint, is a corporation registered and domiciled in the State of Illinois and has been since 1961.
7. At all times material, COOK COUNTY was an employer as defined within the meanings of Title VII.
8. At all times material, COOK COUNTY had a statutory duty to take all reasonable and necessary steps to eliminate discrimination and retaliation from the workplace and to prevent it from happening in the future.

### **FACTUAL ALLEGATIONS**

9. In or about in August 1991, ANTLITZ began her employment with Defendant, COOK COUNTY.
10. Her most recent position was Ecologist II.
11. From the commencement of her employment through present, ANTLITZ consistently performs the duties and responsibilities of her position in an acceptable manner.
12. Plaintiff is an female, and as such, a member of a class protected under Title VII of the Civil Rights Act of 1964, as amended by the Equal Opportunity Act of 1972 and the Civil Rights Act of 1991, 42 U.S.C.A. §§ 2000e-17.

### **COUNT I –SEX DISCRIMINATION**

13. ANTLITZ repeats and realleges Paragraphs one through twelve (1-12) of her Complaint as Paragraphs one through twelve (1-12) of Count II as though fully set forth herein.
14. Title VII makes it an unlawful employment practice for an employer to discrimination against any employee based on their sex.
15. COOK COUNTY, through its employees unlawfully discriminated against ANTLITZ in violation of Title VII by, among other unlawful actions, treating her unfairly and subjecting her to a pattern of injurious conduct eventually leading to her termination which was eventually reduced to a 29-day suspension and which both COOK COUNTY and ANTLITZ are currently appealing.
16. As a direct and proximate result of COOK COUNTY's unlawful employment practices and sex discrimination, ANTLITZ has suffered and continues to suffer, among other damages, loss of employment, emotional harm and mental anguish, embarrassment and related physical and psychological injuries of a severe and permanent nature.

**WHEREFORE**, Plaintiff, DEBORAH ANTLITZ, prays that this Honorable Court grant judgment in her favor and against Defendant, COOK COUNTY, and this Honorable Court grant her the following relief:

- A. Enter a declaratory judgment that the practices complained of herein are unlawful and violate the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991;
- B. Permanently enjoin COOK COUNTY, their agents, successors, officers, employees, attorneys, and those acting in concert with them from engaging in each of the unlawful practices, policies, customs, and usages set forth herein, and from continuing any and all practices shown to be in violation of applicable law;
- C. Order modifications or eliminations of COOK COUNTY's practices, policies, customs and usages set forth herein and all other such practices shown to be in violation of applicable law so that they will not discriminate or harass on the basis of sex;
- D. Sufficient reparation to compensate her for her losses;
- E. Compensate and make ANTLITZ whole for all benefits he would have received but for the retaliatory discriminatory practices of COOK COUNTY;
- F. Award ANTLITZ the costs and disbursements of her action, including reasonable attorney's fees; and
- G. Grant such other relief as may be just and proper.

### **COUNT II RETALIATION**

17. ANTLITZ repeats and realleges Paragraphs one through twelve (1-12) of her Complaint as Paragraphs one through twelve (1-12) of Count II as though fully set forth herein.

18. Title VII makes it an unlawful employment practice for an employer to retaliate against any employee who opposes or otherwise complains about an unlawful employment practice.
19. During her employment, she filed a Charge of Discrimination against Defendant, COOK COUNTY, for sex discrimination, harassment and retaliation.
20. In response to ANTLITZ's complaint and charges filed with the above, COOK COUNTY, through its employees unlawfully retaliated against ANTLITZ in violation of unlawful employment practices and Title VII by, among other unlawful actions, treating her unfairly and subjecting her to a pattern of injurious conduct eventually leading to her termination which was eventually reduced to a 29-day suspension and which both COOK COUNTY and ANTLITZ are currently appealing.
21. ANTLITZ's termination followed her having engaged in protected activity within such a period of time as to raise an inference of retaliatory motivation.
22. As a direct and proximate result of COOK COUNTY's unlawful employment practices and retaliation, ANTLITZ has suffered and continues to suffer, among other damages, loss of employment, emotional harm and mental anguish, embarrassment and related physical and psychological injuries of a severe and permanent nature.

**WHEREFORE**, Plaintiff, DEBORAH ANTLITZ prays that this Honorable Court grant judgment in her favor and against Defendant, COOK COUNTY, and this Honorable Court grant her the following relief:

- H. Enter a declaratory judgment that the practices complained of herein are unlawful and violate the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991;

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- J. Order modifications or eliminations of COOK COUNTY's practices, policies, customs and usages set forth herein and all other such practices shown to be in violation of applicable law so that they will not discriminate or harass on the basis of sex;
- K. Sufficient reparation to compensate her for her losses;
- L. Compensate and make ANTLITZ whole for all benefits he would have received but for the retaliatory discriminatory practices of COOK COUNTY;
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Respectfully Submitted,

/s/ Cynthia M Rote  
By: An Attorney for Plaintiff

Cynthia M Rote  
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By: An Attorney for Plaintiff

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